

Before the  
**Federal Communications Commission**  
Washington, D.C. 20554

In the Matter of	)	
	)	
Telecommunications Relay Services,	)	CC Docket No. 03-123
and Speech-to-Speech Services for	)	
Individuals with Hearing and Speech	)	
Disabilities	)	
_____	)	

**Request to Amend Petition for Rulemaking to Mandate Captioned  
Telephone Relay Service; Request for Expedited Clarification on the Provision of  
Internet Protocol Captioned Telephone Relay Service**

On October 31, 2005, Petitioners filed a Petition for Rulemaking to Mandate Captioned Telephone Relay Service and Approve IP Captioned Telephone Relay Service.<sup>1</sup> By this pleading, Ultratec seeks permission to amend that pleading, and to specifically request expedited clarification that Internet protocol captioned

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<sup>1</sup> Hearing Loss Association of America (formerly Self Help for Hard of Hearing People SHHH), Alexander Graham Bell Association for the Deaf and Hard of Hearing (AG Bell), American Academy of Audiology (AAA), American Association of People with Disabilities (AAPD), American Speech Speech-Language-Hearing Association (ASHA), Association of Late-Deafened Adults (ALDA), Deaf and Hard of Hearing Consumer Advocacy Network (DHHCAN), League for the Hard of Hearing (LHH), National Association of the Deaf (NAD), National Cued Speech Association (NCSA), Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI), California Association of the Deaf (CAD), and California Coalition of Agencies Serving the Deaf and Hard of Hearing (CCASDHH).

telephone relay service is a telecommunications relay service eligible for reimbursement from the Interstate TRS fund. Petitioners make this request because they believe that while a rulemaking proceeding may be necessary to gather information needed to establish a nationwide mandate for captioned telephone relay service, a drawn-out rulemaking proceeding is not necessary to determine that captioned telephone provided over the Internet is a reimbursable interstate relay service. The FCC has already determined both captioned telephone and Internet relay service to be a telecommunications service.<sup>2</sup> Because Internet protocol relay service is merely an extension of these already-approved services, there should be no obstacles to the FCC's approval of this Internet captioned telephone relay service in an expedited fashion.

Respectfully submitted,



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<sup>2</sup> *Telecommunications Relay Services, and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CC Dkt No. 98-67, FCC 03-190, Declaratory Ruling (released August 1, 2003) (approving single line captioned telephone); *Telecommunications Relay Services, and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CC Dkt No. 98-67, CG Docket No. 03-123, FCC 05-141, Order (released July 19, 2005) (approving two-line captioned telephone); Declaratory Ruling and Second Further Notice of Proposed Rulemaking FCC 02-121, 17 FCC Rcd 7779 (2002); Order on Reconsideration, FCC 03-46, 68 FR 18825 (April 16, 2003) (approving Internet-based relay service).

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<sup>3</sup> The California Coalition includes: Norcal Center on Deafness; Greater Los Angeles Agency on Deafness; Deaf and Hard of Hearing Service Center; Deaf Community Services of San Diego; Center on Deafness Inland Empire; Tri-County GLAD; Orange County Deaf Equal Access Foundation; and Deaf Counseling, Advocacy and Referral Agency.

<sup>4</sup> Members of DHHCAN are: American Association of the Deaf-Blind, American Deafness and Rehabilitation Association, Association of Late-Deafened Adults, American Society for Deaf Children, Conference of Educational Administrators of Schools and Programs for the

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Deaf, Communication Service for the Deaf, Deaf Seniors of America, Gallaudet University, Gallaudet University Alumni Association, Jewish Deaf Congress, National Association of the Deaf, National Black Deaf Advocates, National Catholic Office of the Deaf, Registry of Interpreters for the Deaf, Telecommunications for the Deaf and Hard of Hearing, USA Deaf Sports Federation, and Caption Center/WGBH.